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July 14, 2010

Mr. Don Heller
U.S. Environmental Protection Agency, Region 5
Waste Management Division
77 West Jackson Blvd., HRP-8J
Chicago, IL 60604-3590

RE: Second Quarter 2010 Progress Report
RCRA Corrective Action
Allison Transmission, Speedway, IN
USEPA ID Nos. IND006413348 and IND000806828

Dear Mr. Heller:

The attached progress report is submitted on behalf of General Motors LLC (GM), in accordance with the requirements of the Performance-Based Corrective Action Agreement between the U.S. Environmental Protection Agency Region 5 (USEPA) and General Motors Corporation. The progress report covers the second quarter of 2010 (April 1, 2010 through June 30, 2010).

Please contact me if you would like to discuss this matter further. Thank you.

Sincerely,

David M. Favero, P.G.
Project Manager

Attachment A – Second Quarter 2010 Progress Report

C: Glynda Oakes, IDEM Office of Land Quality (via e-mail)
Adam Rickert/Pam Thevenow, Marion County Health Department (via e-mail)
Marilyn Dedyne/Jean Caufield, GM (via e-mail)
Kim Crame/Sue Barto, Allison Transmission, Inc. (via e-mail)
Speedway Library (Public Information Repository) (paper)

ref: c:\proj\gmatd\rcracorrectiveaction\qtrlyreports\2qtr2010report_1007_Allison_final

ATTACHMENT A
SECOND QUARTER 2010 PROGRESS REPORT
PERFORMANCE-BASED RCRA CORRECTIVE ACTION
ALLISON TRANSMISSION
APRIL 1, 2010 TO JUNE 30, 2010

WORK PERFORMED THIS QUARTER

- Installed and collected groundwater samples from six additional monitoring wells associated with the Vermont Street evaluation.
- Completed and submitted the *Supplement No. 2 to RCRA Facility Investigation: Vermont Street Investigation Data Report*, RCRA Corrective Action, Allison Transmission, Inc., Speedway, Indiana, USEPA ID #IND006413348 & IND000806828.
- Completed and submitted a technical memorandum: *Summary of Analytical Validation Reports, Vermont Street Investigation*, General Motors LLC at Allison Transmission, Inc., Speedway and Indianapolis, Indiana.
- Completed and submitted *1st Quarter 2010 Progress Report*, RCRA Corrective Action, Allison Transmission, Speedway, IN, USEPA ID Nos. IND006413348 and IND000806828.
- Collected groundwater samples from monitoring wells associated with the CA750 Environmental Indicators Report and associated with evaluation of the interim measures remediation systems at Plant 12 Former Degreaser Area. Groundwater samples were collected with low-flow and passive diffusion bag sampling techniques.
- Continued operation and maintenance of interim measures: soil vapor extraction (SVE)/groundwater recovery system at the Plant 12 Former Degreaser Area (AOI 51), passive free product recovery and groundwater recovery related to the diesel fuel impacted groundwater plume (AOI 40), total fluids recovery at the waste treatment area (AOI 19), and passive free product recovery at the Transmission Test Assembly Area (AOI 53).

DATA AVAILABLE DURING THIS QUARTER

- Analytical results from monitoring air emissions from the Plant 12 former degreaser area SVE and air stripper exhaust stacks (to be included in the *RCRA Corrective Action Interim Measures Semi-Annual Status and Groundwater Monitoring Report*, First Half 2010, anticipated submittal date October 14, 2010).

- Analytical results from monitoring the effluent from the pretreatment of recovered groundwater from the diesel fuel plume (Outfall 003), and effluent from the treatment of recovered groundwater from the Plant 12 Former Degreaser Area (Outfall 004), (to be included in the *RCRA Corrective Action Interim Measures Semi-Annual Status and Groundwater Monitoring Report*, First Half 2010, anticipated submittal date October 14, 2010).
- Analytical results from newly installed monitoring wells (included in *Supplement No. 2 to RCRA Facility Investigation: Vermont Street Investigation Data Report* submitted to USEPA on 5/21/10).
- Analytical results from monitoring wells associated with the CA750 Environmental Indicators Determination and associated with evaluation of the interim measures remediation systems at Plant 12 Former Degreaser Area (to be included in the *RCRA Corrective Action Interim Measures Semi-Annual Status and Groundwater Monitoring Report*, First Half 2010, anticipated submittal date October 14, 2010).

PROBLEMS ENCOUNTERED

- None.

SUMMARY OF PROBLEM RESOLUTION

- NA

POTENTIAL PROBLEMS

- None.

ESTIMATED PERCENT COMPLETE FOR SELECTED ACTIVITIES

- | | |
|------------------------------|------|
| • DOCC | 100% |
| • Public Participation Plan | 100% |
| • RFI Work Plan | 100% |
| • RFI Phase I Implementation | 100% |

• RFI Data Report (through Phase I data)	100%
• RFI Phase II Implementation	100%
• RFI Data Report (updated to include Phase II data)	100%
• RFI Phase III Implementation	100%
• Plant 12 Former Degreaser Area (AOI 51) Downgradient Groundwater Migration Control Interim Measures Work Plan	100%
• Plant 12 Former Degreaser Area (AOI 51) Downgradient Groundwater Migration Control Interim Measures Implementation	100%
• AOI 19 Interim Measures Work Plan	100%
• AOI 19 Interim Measures Implementation	100%
• Draft RFI Report	100%
• Final RFI Report (Submitted February 20, 2009)	100%
• Environmental Indicator Human Health - CA725 Determination (Due by March 31, 2008 and Submitted on March 28, 2008); Resubmitted on July 1, 2008 and approved by USEPA on September 25, 2008.	100%
• Environmental Indicator Groundwater Migration - CA750 Determination (Due by March 31, 2008 and Submitted on March 28, 2008)	100%
• Sampling to Support Corrective Measures Proposal and Confirm RFI Results	100%
• Data Report for Additional Sampling	100%
• AOI 2-1 Interim Measures Work Plan (Approved by USEPA on November 6, 2008)	100%

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| • AOI 2-1 Interim Measures Implementation | 100% |
| • Stage II Additional Sampling to Support the Corrective Measures Proposal and to Support Evaluation of Interim Measures System Performance | 100% |
| • Data Report For Stage II Additional Sampling (Submitted March 27, 2009) | 100% |
| • Stage III Sampling Matrix (Submitted June 19, 2009) | 100% |
| • Stage III Additional Sampling Implementation | 100% |
| • Data Report For Stage III Additional Sampling | 100% |
| • Corrective Measures Proposal (Revised due date; March 31, 2009: Submitted March 31, 2009) | 100% |
| • Operation, Monitoring and Maintenance of Interim Measures
[Note that the estimated percent complete for these interim measures are only intended to be rough approximations and are subject to revision based on review of monitoring data. Discontinuing operation of any of these interim measures will be coordinated with USEPA and will be based on a review of monitoring data and evaluation of appropriate risk-based end points, if applicable.] | |
| - Plant 12 PCE Soil Vapor Extraction System | 49% |
| - Plant 12 PCE Groundwater Recovery System | 9% |
| - Plant 12 Transmission Test Assembly Area | 73% |
| - Diesel Fuel Plume Recovery System | 58% |
| - Waste Treatment LNAPL Recovery System | 10% |

SUMMARY OF CONTACTS WITH INTERESTED PARTIES

- Attended USEPA-sponsored public meeting regarding the Vermont Street Area Investigation.
- GM LLC was contacted by the counsel for the Speedway Redevelopment Commission (SRC) regarding technical reports related to Plant 2. GM LLC submitted an excerpt of the RCRA Facility Investigation Report and Corrective Measures Proposal to counsel for SRC.
- Provided the following documents to the public information repository this quarter:

- *First Quarter 2010 Progress Report*, RCRA Corrective Action, Allison Transmission, Inc., Speedway, IN, USEPA ID Nos. IND000806836 and IND094469913, April 14, 2010.
- *Supplement No. 2 to RCRA Facility Investigation: Vermont Street Investigation Data Report*, RCRA Corrective Action, Allison Transmission, Inc., Speedway, Indiana, USEPA ID #IND006413348 & IND000806828.
- *Summary of Analytical Validation Reports, Vermont Street Investigation, General Motors LLC* at Allison Transmission, Inc., Speedway and Indianapolis, Indiana.

CHANGES IN PERSONNEL

- None.

PROJECTED WORK FOR NEXT REPORTING PERIOD

- Continue preparation of the *RCRA Corrective Action Interim Measures Semi-Annual Status and Groundwater Monitoring Report for the First Half 2010*.
- Split groundwater samples with USEPA for Vermont Street Evaluation.
- Schedule groundwater sampling per CA750 for Fall 2010.
- Prepare responses, summaries of meetings, data reviews, or other conference calls with USEPA, as appropriate.
- Perform routine operation, monitoring and maintenance for operating remediation systems and implement duplicate high level alarms at remediation systems.
